

FEDERAL ROOM

Federal Communications Commission

FCC 97-123

MAY 23

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Toll Free Service Access Codes)	CC Docket No. 95-155
)	
Petition to Modify 888 Number Allocation Plan filed by LCI International, Inc.)	NSD File No. 97-10
)	
Petition to Modify 888 Number Allocation Plan filed by UniDial, Inc.)	NSD File No. 97-15
)	
Petition to Modify 888 Number Allocation Plan filed by Consolidated Communication Telecom Services Inc.)	NSD File No. 97-16
)	

COMMENTS ON FURTHER NOTICE OF PROPOSED RULEMAKING

We are submitting these comments via mail on May 22, 1997, delivery to the Secretary on May 23, 1997, and E-Mail on May 22, 1997 to dconway@fcc.gov.

MOTION FOR LATE FILING: (1 Day) It is requested that permission be granted, if necessary, for a 1 day late filing, due to the unavailability of the Proposed Rulemaking on the FCC's 800/888 Web Site. The document was finally found elsewhere deep in the FCC general Web site address. Paragraph numbers are from the Order and NPRM.

95. In the NPRM, FCC sought comment on the appropriate party to administer the toll free database. FCC noted that DSMI is currently the primary administrator of the toll free database,¹ and stated that the RBOCs had announced plans to sell Bellcore, which is the parent company of DSMI.²

¹ See NPRM at 13705. In response to industry concerns, Bellcore established DSMI for the purpose of administering the SMS/800, and subcontracted functions requiring access to proprietary customer information to a neutral third party, Lockheed IMS.

² Id. See also para. 8, supra.

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FCC sought comment on whether DSMI should continue to administer the toll free database or whether another neutral entity, such as the North American Numbering Plan Administrator, should be the administrator.³ We believe that a neutral Administrator should be chosen in a manner similar to the NANPA Administrator with NANC recommendation.

FCC asked parties to comment on whether the administrative database functions currently performed by DSMI and Lockheed should be performed by independent third parties not affiliated with Bellcore, the RBOCs, or current owners of the regional databases.⁴ We believe that the database should be owned by a quasi-governmental corporation, and be administered by a neutral contractor.

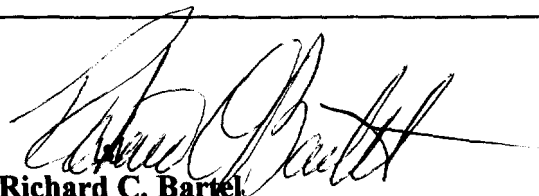
103. FCC seeks comment on what further action the 1996 Act requires that the Commission take to ensure that there is an impartial number administrator for toll free administration.⁵ FCC seeks comment on what role, if any, the NANC should have in determining what entity should assume the responsibility of toll free database administration. We seek comment on whether the toll free database administrator should be the same entity that ultimately is chosen as the NANP administrator or the number portability administrator, or whether another administrator should be chosen strictly for the toll free database.

We believe that NANC should only recommend a contractor to the quasi-governmental corporation.

³ Id.

⁴ Id.

⁵ In the Local Competition Second Report and Order, the Commission responded to arguments that the NANP Order did not meet the requirements of § 251(e)(1) because it did not address toll free number administration. The Commission noted that the NANP Order directed the NANC to provide recommendations on the question of what number resources, beyond those currently administered by the NANP administrator, the NANP Administrator should administer. The Commission stated that its purpose in directing the NANC to address this question was to develop a record on the issue of whether the new administrator should assume additional responsibilities beyond those of the current NANP administrator to facilitate competition in telecommunications services. According to the Commission, by asking the question and seeking recommendations from the NANC, it set into motion a process designed to foster competition in all telecommunications services, including toll free service, through numbering administration. See Local Competition Second Report and Order at para. 266.

A handwritten signature in black ink, appearing to read "Richard C. Bartel", is written over a horizontal line.

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as President,
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